

Before the  
**Federal Communications Commission**  
Washington, DC 20554

In the Matter of

Application by BellSouth Corporation, and its )  
subsidiaries, BellSouth Telecommunications, Inc., )  
and BellSouth Long Distance, Inc. for Authorization) )  
to Provide In-Region, InterLATA Services in the )  
States of Georgia and Louisiana )

**CC Docket No. 01-277**

**COMMENTS**  
**REGARDING BELLSOUTH CORPORATION APPLICATION FOR**  
**AUTHORIZATION UNDER SECTION 271 OF THE COMMUNICATIONS ACT**  
**TO PROVIDE IN-REGION, INTERLATA SERVICES**  
**IN THE STATES OF GEORGIA AND LOUISIANA**

Submitted by the

**NATIONAL URBAN LEAGUE**

October 22, 2001

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The National Urban League urges the Federal Communications Commission (FCC) to approve the joint Application filed by BellSouth Corporation, and its subsidiaries, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., (collectively, BellSouth) for authorization to provide in-region, interLATA service in the States of Georgia and Louisiana, pursuant to section 271 of the Communications Act of 1934, as amended (the Act), 47 U.S.C. § 271. As articulated in greater detail below, the National Urban League views the approval of BellSouth's Georgia and Louisiana 271 (Application) as in being in the public interest of consumers in these states.

## **I. Statement of Interests**

**The National Urban League, Inc.** ("The League"), founded in 1910, is the nation's oldest and largest community-base movement dedicated to empowering African Americans to enter the social and economic mainstream. The League is headquartered in New York City, and has more than 100 affiliates in 34 states and the District of Columbia. The League implements its mission through advocacy, bridge building, program services and research.

## **II. Comments**

This year marks the fifth anniversary since Congress passed the Telecommunications Act of 1996 (the Act). The Act promised job creation, economic development and access for consumers to competitive communications services. Unfortunately, consumers and communities in just seven states -- New York, Texas, Kansas, Oklahoma, Massachusetts, Connecticut and Pennsylvania -- are realizing the

benefits of the Act. The League supports BellSouth's Application to provide long-distance service quite simply, because it is the right thing to do. The League has a proud history of advocating social and economical inclusion of African Americans into the mainstream. From its focus at the turn of the Twentieth Century to help Southern black migrants overcome racial and economic barriers in the North, to its current involvement with the PowerUP<sup>1</sup> movement nationwide to help underserved youth with access to technology and guidance to use computers and the Internet most effectively, the National Urban League has always looked beyond the obstacles that lay before its constituents and sought to fashion tools that provide opportunities for social and economic advancement.

One of this nation's largest challenges is to provide consumers and communities with access to robust and alternative communications service. This nation's recent tragic events underscore just how important it is for people to be able to communicate with one another. This is the case regardless of where one resides. The League notes that where 271 applications were approved, consumers were given access to real competitive choices in long distance and local telephone service plans. While different studies calculate the exact amount of consumers, most agree that consumers are saving millions of dollars in both long distance and local telephone service.<sup>2</sup> For example, economist Stephen B. Posiak estimated that consumers in BellSouth's entire service area could save as much as \$4.6 billion.

Currently there is little incentive for long distance providers in Georgia and Louisiana to reduce their rates. BellSouth will provide innovative calling plans with no

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<sup>1</sup> PowerUP is a national initiative that provides underserved youth with access to technology and guidance to use computers and the Internet most effectively. PowerUP and the National Urban League have created a partnership to launch PowerUP sites within National Urban League affiliates nationwide.

monthly minimums and no monthly fees. This is particularly beneficial to low volume and low-income consumers. BellSouth intends to provide consumers in Georgia and Louisiana with the same if not better benefits. BellSouth will provide residential consumers in calling plans that are simpler and less expensive than most carriers as well as calling plans that are innovative and which meet the unique calling needs and patterns of Georgia and Louisiana consumers. The obstacle for Georgia and Louisiana residential consumers is not having the benefit of truly competitive local and long-distance service plans. The opportunity exists for BellSouth to be the catalyst of innovative and competitive pricing plans. The FCC's approval of BellSouth's Application is the tool for consumers to realize the opportunity for substantial savings.

As previously mentioned the League is not only concerned with the social implications of providing its constituents with access to competitive communications service, the League is also concerned with the economic impact of this Application. While the nation's economy is slowing, BellSouth's entry has the potential of sustaining and possibly creating jobs as the company and its competitors upgrade network infrastructure and expand the number of services offered to compete in long distance. Further, more competition will provide BellSouth with incentives for increased investment necessary to bring the full range of advance telecommunications to Georgia and Louisiana consumers.

Finally, the League shares the sentiment of the Public Service Commissions in Georgia and Louisiana that BellSouth's local markets are open. According to BellSouth, in Georgia, about 128 local competitors serve over 880,000 customer lines, which

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<sup>2</sup> TRAC estimates that Georgia consumers would save \$85 to \$301 million in local and long distance service. (September 6, 2001 <http://trac.policy.net/relatives/17340.pdf> ).

amounts to 16% of all lines in state and 233 competitors have been certified to offer local service. Similarly, in Louisiana, 80 local competitors serve over 245,000 customer lines, which amounts to nearly 9 % of all lines in the state. Additionally, 117 competitors have been certified to offer local service in Louisiana.

### **III. Conclusion**

The National Urban League views the approval of BellSouth's Application to provide long distance service to consumers in Georgia and Louisiana as being in the public interest. The FCC's approval of this Application will significantly benefit the social and economic position of many consumers in Georgia and Louisiana, many of whom are League constituents. Consumers stand to save millions on innovative, competitive and custom-tailored local and long-distance plans. Additionally, while not guaranteed, jobs could be created or at least maintained by the nearly \$2 billion that BellSouth has invested in preparation for entry into the long distance market. Finally, approval of this Application will provide BellSouth with incentives to increased investment in advance telecommunications. It is within the FCC's means to provide consumers in Georgia and Louisiana with the opportunity to have access to competitive and innovative communication services. Accordingly, the National Urban League strongly requests your approval of BellSouth's Application.

Respectfully submitted,

Milton J. Little, Jr.,  
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